

Commanding Officer
U. S. Coast Guard
Marine Safety Office Puget Sound

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MMS Co., Ltd. Attn: Captain H. Wakisaka 1-18-12 Kamimeguro Meguro-ku Tokyo, Japan 153-0051

Subj: LETTER OF CONCERN; M/V SOUTHERN ACE, O.N. L7929712

Dear Captain H. Wakisaka,

I am writing this letter to express my concern over the materiel condition of the M/V SOUTHERN ACE, and the performance of her crew on March 2, 2000, when the vessel lost steering during her transit through the Strait of Juan De Fuca.

On March 2, 2000, the Puget Sound Vessel Traffic Service (VTS) received a call from the SOUTHERN ACE indicating that the vessel was force to drift without steerage due to the loss of primary steering control. The vessel lost steering control for approximately ten minutes due to an air leak in the steering hydraulic system. Subsequently, the master informed VTS that repairs were made to the leak and the steering system was back in operation. Additionally, the master stated that he intended to increase speed to 18 knots. I was not satisfied that there was enough information about the repair to allow a return to normal operations in piloting waters without appropriate operational controls to properly mitigate the risks should the steering failure recur. Consequently, I directed the vessel to proceed to the Tacoma Pierce County Terminal at minimum safe speed with tug escort and to remain moored at Tacoma until permanent repairs were conducted and a satisfactory inspection was completed by Coast Guard marine inspectors and the vessel's classification society, Nippon Kaiji Kyokai.

The steering system inspection completed by Coast Guard inspectors found the 'repair' consisted of tape over the leaking hydraulic line. In addition, both main steering gear pumps were leaking hydraulic fluid from the shaft seals and the steering flat was saturated with hydraulic oil. The class surveyor issued an outstanding recommendation at the request of the Coast Guard inspector to have the steering pump seals repaired by April 1, 2000; permanent repairs consisting of a new hydraulic line were made at that time.

The port state control boarding team documented four deficiencies during the examination of the vessel. Additionally, though not severe enough to issue a detention, the housekeeping and

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general materiel condition of the engineering spaces and ship were poor. The depressed physical appearance of the vessel was recently noted in a letter posted in the engine room, from your company to the vessel's Master. The letter further stated that the condition and appearance of the ship was the worst in the fleet and directed the Master to immediately rectify the matter. I consider these problems to indicate that SOUTHERN ACE poses an increased risk to the safety of United States' waters. Accordingly, I am entering an inspection note into the vessel's file in our electronic database documenting this incident and recommending that other Coast Guard Marine Safety Offices closely scrutinize the operation of the SOUTHERN ACE while in U.S. ports. This action may result in an increased number of boardings under our Port State Control Program.

While your earlier letter to the vessel's master indicates you were aware of problems on the SOUTHERN ACE, further follow up actions are needed. Please advise me of the steps you are taking to improve the condition and safe operations of the SOUTHERN ACE and other vessels in your fleet. I will consider your follow up actions when making Port State Control and operational measures decisions on future port calls by your vessels.

Any questions may be directed to LT Linda Sturgis at the above number and address.

Sincerely,

M. R. MOORE

Captain, U.S. Coast Guard
Captain of the Port, Puget Sound

Copy: Nippon Kaiji Kyokai

Williams Dimond Agency

Commander, Thirteenth Coast Guard District (m)

Puget Sound Vessel Traffic Service

Washington State Department of Ecology, Prevention

Puget Sound Pilots

Puget Sound Steamship Operators Association